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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Sanjay Bhatnagar,

Plaintiff,

vs.

The United States of America,

Defendant.

Case No. 14-cv-00327-MEJ

**STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING DEADLINES**

Whereas, on June 7, 2016 the parties participated in a settlement conference before Magistrate Judge Beeler. The parties did not reach an agreement, but agreed that further settlement discussions may be helpful;

Whereas the parties discussed with Magistrate Judge Beeler a potential extension of the schedule with the goal of facilitating further meaningful settlement discussions in connection with summary judgment motions and ahead of trial;

Whereas, with Magistrate Judge Beeler's advice, the parties have agreed that extending the remaining case deadlines and staging the case to allow for early dispositive motions and a hearing on December 22, 2016, would best facilitate further meaningful settlement discussions ahead of trial;

Whereas the parties have also agreed that certain expert disclosures and discovery related to mitigation and damages issues can and should be scheduled after summary judgment motions. Specifically, the parties have agreed that economic expert reports and medical and vocational expert reports concerning plaintiff's current medical condition, disability status, and ability to work should be deferred, which will allow the parties additional time to schedule any necessary examinations, to resolve any disputes regarding the conditions of such discovery, and to explore potential stipulations regarding these issues.

Therefore, the parties hereby stipulate and agree that the following deadlines are extended or implemented as follows, pending the Court's availability and approval:

Event	Current Date	Proposed Date
Disclosure of Expert Witnesses (excluding damages and mitigation issues)	June 27, 2016	September 16, 2016
Disclosure of Rebuttal Expert Witnesses (excluding damages and mitigation issues)	July 11, 2016	September 30, 2016
Close of Fact Discovery	July 24, 2016	October 21, 2016
Deadline to File Dispositive Motions	August 24, 2016	November 4, 2016
Hearing on Dispositive Motions	October 6, 2016 10:00 a.m.	December 22, 2016 10:00 a.m.

Event	Current Date	Proposed Date
Disclosure of Additional Expert Witnesses on damages and mitigation issues	N/A	January 20, 2017
Disclosure of Additional Rebuttal Expert Witnesses on damages and mitigation issues	N/A	February 3, 2017
Close of Expert Discovery	N/A	February 17, 2017
Deadline to File Pretrial Conference Statement and Related Disclosures, Exhibit Lists, Motions in Limine, and Trial Briefs and Related Documents	October 13, 2016	March 3, 2017
Deadline to File Motions in Limine Oppositions	October 20, 2016	March 10, 2017
Pretrial Conference	November 3, 2016 10:00 a.m.	April 5, 2017 at 10:00 a.m.
Final Pretrial Conference	December 1, 2016 10:00 a.m.	April 13, 2017 at 10:00 a.m.
Trial	December 12, 2016 9:30 a.m. (Duration: 4 days)	May 1, 2017 9:30 a.m. (Duration: 4 days)

June 21, 2016

FARELLA BRAUN + MARTEL LLP

By: /s/ Julia Kropp
Julia Kropp

Attorneys for Plaintiff Sanjay Bhatnagar

June 21, 2016

BRIAN J. STRETCH
United States Attorney

By: /s/ Robin Wall
Robin M. Wall
Assistant United States Attorney

Attorneys for Defendant United States of
America

FILER'S ATTESTATION

In compliance with Civil L.R. Rule 5-1, I hereby attest that all parties have concurred in the filing of this Stipulation and (Proposed) Order.

June 21, 2016

/s/ Julia Kropp
Julia Kropp

Stipulation and [Proposed] Order Extending
Deadlines / Case No. 14-cv-00327-MEJ

~~PROPOSED~~ ORDER

In accordance with a stipulation between the parties, IT IS ORDERED that the schedule in this case be amended as follows:

Event	Current Date	Proposed Date
Disclosure of Expert Witnesses (excluding damages and mitigation issues)	June 27, 2016	September 16, 2016
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Date: June 22, 2016


 Honorable Maria-Elena James
 United States Magistrate Judge